UNITED STATES DISTRICT COURT

for the Southern District of Ohio

In the Matter of the Search of					
(Briefly describe the property to be searched or identify the person by name and address)) Case No. 2:22-mj-266				
UNITED STATES PRIORITY MAIL PARCELS 9505 5066 6901 2101 4671 53, 9505 5066 6901 2101 4671 77, and 9505 5066 3116 2101 4895 05					
APPLICATION FOR A WARRANT BY TELEP	HONE OR OTHER RELIABLE ELECTRONIC MEANS				
penalty of perjury that I have reason to believe that on the property to be searched and give its location):	ey for the government, request a search warrant and state under the following person or property (identify the person or describe the				
9505 5066 3116 2101 4895 05	066 6901 2101 4671 53, 9505 5066 6901 2101 4671 77, and				
located in the Southern District of	Ohio , there is now concealed (identify the				
person or describe the property to be seized):					
A quantity of a controlled substance and/or proceeds the 21, United States Code, Sections 841(a)(1), 843(b), and	nat are evidence thereof, and/or contraband, in violation of Title d 846.				
The basis for the search under Fed. R. Crim. P. 4 evidence of a crime:	41(c) is (check one or more):				
contraband, fruits of crime, or other iter	ns illegally passassed:				
property designed for use, intended for					
☐ a person to be arrested or a person who	is unlawfully restrained.				
The search is related to a violation of:					
21 U.S.C. 843(b) Prohibited use of	Offense Description Intent to distribute a controlled substance a communication center (U.S. Mail) ssess with intent to distribute a controlled substance				
The application is based on these facts:					
As set forth in the attached Affidavit of Postal Insp	ector Justin D. Koble.				
✓ Continued on the attached sheet.					
Delayed notice of 30 days (give exact ending date if more than 30 days:) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.					
	The state of the s				
	Applicant's signature				
	Justin D Koble, US Postal Inspector				
	Printed name and title				
Attested to by the applicant in accordance with the requitelephone (sp	rements of Fed. R. Crim. P. 4.1 by ecify reliable electronic means).				
Date: 4/13/2022	Oldsey M. Vasara				
	Judge's signature				
City and state: Columbus, Ohio	Chelsey M Vascura, U.S. Magistrate Judge				
	Printed name and title				

AFFIDAVIT IN SUPPORT OF AN APPLICATION UNDER RULE 41 FOR A WARRANT TO SEARCH AND SEIZE

I, Justin D. Koble, being duly sworn, do hereby state the following:

INTRODUCTION AND AGENT BACKGROUND

- 1. I am a United States Postal Inspector with the United States Postal Inspection Service ("USPIS") and have been so employed since July 2014. I am currently assigned to the Narcotics and Money Laundering Team at the USPIS's Columbus, Ohio field office. In this capacity, I am responsible for investigating the use of the United States Mails for the purpose of transporting controlled substances such as methamphetamine, heroin, fentanyl, fentanyl-related analogs, cocaine, and other controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) (manufacturing, distribution, or possession with the intent to manufacture or distribute a controlled substance), 843(b) (unlawful use of a communication facility in the commission of a crime), and 846 (drug conspiracy). In addition, I am responsible for investigating possible violations of Title 18, United States Code Sections 1956 and 1957 (money laundering).
- 2. I have been involved in the investigation and discovery of drug contraband and drug proceeds on numerous occasions. I have personally been the affiant for search warrants which have resulted in the discovery of controlled substances and drug proceeds. My current assignment to the Columbus Processing and Distribution Center ("P&DC") involves investigating the use of the U.S. Mails by drug traffickers, in which established drug package profiles, surveillance, and drug detection dogs, among other investigative tools, are utilized.
- 3. Experience and drug trafficking intelligence have demonstrated that Priority Mail and Priority Mail Express are commonly used to transport illegal drugs and drug proceeds because of their reliability and the time pressures they place on law enforcement agents to execute a successful controlled delivery.
- 4. This Affidavit is made in support of an Application for a search warrant for the following property: a United States Postal Service (USPS) Priority Mail parcel bearing USPS Tracking Number 9505 5066 6901 2107 4671 53 (hereinafter, SUBJECT PARCEL #1), a USPS Priority Mail parcel bearing USPS Tracking Number 9505 5066 6901 2101 4671 77

(hereinafter, SUBJECT PARCEL #2), and a USPS Priority Mail parcel bearing USPS Tracking Number 9505 5066 3116 2101 4895 05 (hereinafter, SUBJECT PARCEL #3), (collectively the SUBJECT PARCELS). This Affidavit is made in support of an Application for a warrant to search the SUBJECT PARCELS for, and seize from the SUBJECT PARCELS, evidence of a crime, as well as contraband, fruits of a crime, or other items illegally possessed in relation to the following offenses:

- a. Possession with Intent to Distribute Controlled Substances, in violation of Title 21, United States Code Section 841;
- b. Use of a Communication Facility, in violation of Title 21, United States Code Section 843(b); and
- c. Conspiracy to Possess with Intent to Distribute Controlled Substances, in violation of Title 21, United States Code Section 846.
- 5. The facts set forth in this Affidavit are based on my personal knowledge, knowledge obtained during my participation in this investigation, knowledge obtained from other individuals, review of records related to this investigation, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. Because this Affidavit is submitted for the limited purpose of establishing probable cause in support of the Application for a search warrant, this Affidavit does not set forth each and every fact learned by me during the course of this investigation.

SUBJECT PARCEL #1

6. On or about April 13, 2022, USPIS interdiction personnel in Columbus, Ohio interdicted SUBJECT PARCEL #1 at the USPS Processing and Distribution Center, 2323 Citygate Drive, Columbus Ohio 43218. SUBJECT PARCEL #1 is addressed to "T. Harris, 3180 Elim Manor Court, Unit 112, Columbus, OH 43232," with a return address of "Margret Stone, 4325 W. Rome Blvd APT 1011, N Las Vegas, NV 89084." SUBJECT PARCEL #1 is a white USPS Priority Mail large flat-rate mailing box measuring approximately 12 ½" x 12 ½" x 6" and weighing approximately 11 pounds 14.4 ounces. SUBJECT PARCEL #1 was mailed from the USPS Crossroads Station Post Office, 6210 North Jones Boulevard, Las Vegas, Nevada 89130, on or about April 11, 2022, at approximately 8:19 a.m. PDT using a Self-Service Kiosk (SSK). A SSK allows USPS customers to mail parcels without having contact with USPS employees.



SUBJECT PARCEL #2

On or about April 13, 2022, USPIS interdiction personnel in Columbus, Ohio interdicted SUBJECT PARCEL #2 at the USPS Processing and Distribution Center, 2323 Citygate Drive, Columbus Ohio 43218. SUBJECT PARCEL #4 is addressed to "T. Harris, 3180 Elim Manor Court, Unit 112, Columbus, OH 43232," with a return address matching SUBJECT PARCEL #1, "Margret Stone, 4325 W. Rome Blvd APT 1011, N Las Vegas, NV 89084." SUBJECT PARCEL #2 is a white USPS Priority Mail large flat-rate mailing box measuring approximately 12 ¼" x 12 ¼" x 6" and weighing approximately 11 pounds 11.2 ounces. SUBJECT PARCEL #2 was mailed from the USPS Crossroads Station Post Office, 6210 North Jones Boulevard, Las Vegas, Nevada 89130, on or about April 11, 2022, at approximately 8:20 a.m. PDT. SUBJECT PARCEL #1 was mailed in the same transaction as SUBJECT PARCEL #2 using a SSK.



SUBJECT PARCEL #3

- 8. On or about April 13, 2022, USPIS interdiction personnel in Columbus, Ohio interdicted SUBJECT PARCEL #3 at the USPS Processing and Distribution Center, 2323 Citygate Drive, Columbus Ohio 43218. SUBJECT PARCEL #3 is addressed to "Leah Perry, 2277 Petzinger Ct., Columbus, OH 43232," with a return address of "Natalie Patterson, 123 Sir George Dr, Las Vegas, NV 89110." SUBJECT PARCEL #3 is a white USPS Priority Mail large flat-rate mailing box measuring approximately 12 ¼" x 12 ¼" x 6" and weighing approximately 7 pounds 12 ounces. SUBJECT PARCEL #3 was mailed from the USPS Topaz Station Post Office, 2675 North Decatur Boulevard, Las Vegas, Nevada 89108, on or about April 11, 2022, at approximately 8:43 a.m. PDT. SUBJECT PARCEL #3 was mailed in the same transaction as SUBJECT PARCEL #3 using a SSK.
- 9. Your Affiant is aware an additional parcel, destined for an address known to be associated with this active drug trafficking investigation, was mailed in the same transaction as SUBJECT PARCEL #3. US Postal Inspectors are currently working to locate this parcel.



PROBABLE CAUSE

- 10. Your Affiant has become aware through experience and training that drug traffickers frequently use Priority Mail Express and/or Priority Mail services offered by the USPS, to transport narcotics and other dangerous controlled substances as well as drug proceeds. These services charge a higher fee because they are very timely, reliable and are trackable. However due to the higher fee, these services are not typically used for personal mailings but rather are utilized by commercial mailers and business customers. As they are mostly used for commercial services, they are typically paid for using electronic postage or credit card as opposed to being paid for in cash. Because these services are reliable and trackable, they are often favored by persons who transport contraband and/or illegal controlled substances and drug proceeds. When used for illegal activity, these services are frequently paid for in cash. In my experience and through training, drug traffickers pay for these services in cash so that the transaction cannot be traced to a particular credit card or business account, and because drug trafficking is often a cash business.
- 11. Also relevant here is the additional characteristic possessed by the SUBJECT PARCELS—namely, the "source state" origination of the parcels. U.S. Postal Inspectors, special agents of the Drug Enforcement Administration (DEA), and other intelligence sources

have identified Nevada, specifically the Las Vegas Metro Area, as a source for illegal drugs flowing into Central Ohio.

- 12. As previously indicated, SUBJECT PARCEL #1 and SUBJECT PARCEL #2 were mailed from the USPS Crossroads Station Post Office, 6210 North Jones Boulevard, Las Vegas, NV 89130 at approximately 8:19 a.m. PDT and 8:20 a.m. PDT respectively. SUBJECT PARCEL #3 and the fourth, yet to be interdicted parcel, were mailed from the USPS Topaz Station Post Office, 2675 North Decatur Boulevard, Las Vegas, Nevada 89103 at approximately 8:41 a.m. PDT and 8:43 a.m. PDT respectively. Checks of open-source mapping software indicate these two USPS facilities are approximately 5.2 miles apart. Additional checks indicate a travel time of between 12 and 26 minutes depending on traffic at that time of day. Based on this information, and the similarities between these parcels, it is likely the mailer of these parcels mailed SUBJECT PARCEL #1 and SUBJECT PARCEL #2 from the USPS Crossroads Station Post Office and then traveled directly to the USPS Topaz Station Post Office to mail SUBJECT PARCEL #3 and the fourth parcel. Based on your Affiant's training and experience, shippers of parcels containing controlled substances will often divide shipments into multiple parcels and will frequently mail these parcels at two or more USPS locations in an effort to minimize suspicious behavior and avoid detection by law enforcement.
- 13. Further, on or about April 13, 2022, checks of USPS, law enforcement, and open-source electronic databases were conducted to determine the validity of the return information contained on SUBJECT PARCEL #1 and SUBJECT PARCEL #2. The return address, "4325 W Rome Blvd, Apt 1011," was found to be a valid and deliverable address in the 89084 zip code. Checks of law enforcement databases failed to associate the name "Margert Stone" with the above address.
- 14. Further, on or about April 13, 2022, checks of USPS, law enforcement, and open-source electronic databases were conducted to determine the validity of the return information contained on SUBJECT PARCEL #3. The return address, "123 Sir George Dr," was found to be a valid and deliverable address in the 89110 zip code. Checks of law enforcement databases failed to associate the name "Natalie Patterson" with the above address.
- 15. On or about April 13, 2022, checks of USPS, law enforcement, and open-source electronic databases were conducted to determine the validity of the destination information contained on SUBJECT PARCEL #1 and SUBJECT PARCEL #2. The address, "3180 Elim

Manor Court, Unit 112," was found to be a valid address in the 43232 zip code. The name "T. Harris" is known to be associated with the address. Terrell Harris is a subject in an active drug trafficking investigation being conducted by the US Postal Inspection Service involving the use of the United States Postal Service for the transportation of methamphetamine and other drugs from California and Nevada to Columbus, Ohio.

- 16. On or about April 13, 2022, checks of USPS, law enforcement, and open-source electronic databases were conducted to determine the validity of the destination information contained on SUBJECT PARCEL #3. The address, "2277 Petzinger Ct.," was found to be a valid address in the 43232 zip code however, the name "Leah Perry" was not found to be associated with the address.
- 17. Based on my experience and training, I know that drug shippers will often list a valid return address with a fictitious name. This is done in an attempt to legitimize the shipment while avoiding detection by law enforcement. A valid recipient's address is necessary to permit the delivery of such parcels and a fictitious recipient name is frequently used.
- 18. Because the SUBJECT PARCELS was found to originate in a location known to be a source for controlled substance being mailed to Ohio, the return/destination information was handwritten, and the return as well as the recipient names were found to be not associated with the address or in the name of an individual known to be involved in a drug trafficking investigation utilizing the US Mail, US Postal Inspectors subjected the SUBJECT PARCELS to examination by a drug detecting canine.

EXAMINATION BY CERTIFIED DRUG CANIE

- 19. On or about April 13, 2022, U.S. Postal Inspectors took custody of the SUBJECT PARCELS from the USPS Processing and Distribution Center, 2323 Citygate Drive, Columbus, Ohio 43218. The SUBJECT PARCELS are currently located at a secure USPS facility located in Columbus, Ohio.
- 20. On or about April 13, 2022, U.S. Postal Inspectors contacted Trooper Lindsey Barrett, Ohio State Highway Patrol, who is the handler for "Gali," a drug detecting canine. "Gali" has been certified by the Ohio Peace Officers Training Association since May 2020 for tracking, article search, and the detection of Marijuana, Cocaine, Heroin, Methamphetamine, and their derivatives. Canine "Gali" has over 200 hours of training at the Ohio Highway Patrol K9 Training Facility. Both in training and actual deployments, canine "Gali" has successfully

detected narcotics; demonstrating clear, passive alerts and establishing himself as a highly

reliable police service dog.

21. The SUBJECT PARCELS were hidden among other parcels and mail processing

equipment and Canine "Gali" was allowed to search the entire area. Trooper Barrett concluded

that "Gali" did alert positively and independently to each of the SUBJECT PARCELS. Based on

that alert, Trooper Barrett concluded that the odor of one of the drugs "Gali" is trained and

certified to detect was present.

CONCLUSION

22. I know based on training and experience that information listed herein identifies common

characteristics of United States Postal Service parcels which contain a controlled substance.

Based upon my experience and training, this information, along with the parcel being mailed

from a location of known drug activity and drug source location is indicative of the parcel

containing narcotics.

23. In addition, based upon the information contained in this Affidavit, your Affiant believes

that there is probable cause to believe that the parcels described below will contain evidence

and/or contraband, fruits of crime, or other items illegally possessed.

WHEREFORE, your Affiant respectfully requests that the Court issue a warrant,

authorizing agents of the USPIS, including but not limited to other law enforcement agents and

technicians assisting in the above-described investigation, to open, view, photograph, and seize,

if necessary, the SUBJECT PARCELS and their contents.

Justin D. Koble

U.S. Postal Inspector

Sworn and subscribed to me this 13th day of April 2022

CHELSEY M VASCURA

UNITED STATES MAGISTRATE JUDGE

AO 93C (08/18) Warrant by Telephone or Other Reliable Electronic Means

☐ Original

Duplicate Original

UNITED STATES DISTRICT COURT

UNITED STATES DISTRICT COURT				
for the				
Southern District of Ohio				
In the Matter of the Search of) (Briefly describe the property to be searched or identify the person by name and address)) UNITED STATES PRIORITY MAIL PARCELS 9505 5066 6901 2101 4671 53, 9505 5066 6901 2101 4671 77, and 9505 5066 3116 2101 4895 05)	Case No. 2:22-mj-266			
WARRANT BY TELEPHONE OR OTHE	R RELIABLE ELECTRONIC MEANS			
To: Any authorized law enforcement officer				
An application by a federal law enforcement officer or an at of the following person or property located in the SOUTHEF (identify the person or describe the property to be searched and give its location): UNITED STATES PRIORITY MAIL PARCELS 9505 5066 6901 21 3116 2101 4895 05	RN District of OHIO			
I find that the affidavit(s), or any recorded testimony, establ described above, and that such search will reveal (identify the person or A quantity of controlled substance and/or proceeds which are evide United States Code, Sections 841(a)(1), 843(b), and 846.	ish probable cause to search and seize the person or property describe the property to be seized): ence thereof, and/or contraband, in violation of Title 21,			
YOU ARE COMMANDED to execute this warrant on or be in the daytime 6:00 a.m. to 10:00 p.m. □ at any time in the daytime of the daytime in the daytime of the	before 4/27/2022 (not to exceed 14 days) he day or night because good cause has been established.			
Unless delayed notice is authorized below, you must give a person from whom, or from whose premises, the property was taken property was taken.	copy of the warrant and a receipt for the property taken to the a, or leave the copy and receipt at the place where the			
The officer executing this warrant, or an officer present duri as required by law and promptly return this warrant and inventory to				
Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized (check the appropriate box) for 30 days (not to exceed 30) until, the facts justifying, the later specific date of				
Date and time issued:	Judge's signature			
City and state: Columbus, Ohio	Chelsey M Vascura, US Magistrate Judge Printed name and title			

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AO 93C (08/18) Warrant by Telephone or Other Reliable Electronic Means (Page 2)

Return					
Case No.:	Date and time warrant executed:		Copy of warrant and inventory left with:		
Inventory made in the presence	of:				
Inventory of the property taken	and name(s) of any person(s) seized	d:			
Certification					
I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.					
Date:			Executing officer's signature		
			Printed name and title		